

WALTER SCOTT OGDEN

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5814 West Palo Verde Avenue

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May 12, 1999

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Dockets Management Branch (HFA-305)

Food and Drug Administration

5630 Fishers Lane, Room 1061

Rockville, MD 20852

Re: Docket No. 98N-1038, "Irradiation in the Production, Processing and Handling of Food"

To Whom It May Concern:

The FDA should retain the current labeling law, the current terminology of "treated with radiation" or "treated by irradiation," and the use of the radura symbol on all irradiated foods, or any foods containing ingredients that have been treated by irradiation. The label should be large enough and prominent enough to be readily visible to the consumer, on the front of the package. For displayed whole foods such as produce, a prominent informational display similar to that used for meats should be used (containing the term "irradiation" and the radura). This irradiation labeling (both label and radura) **should not expire at any time in the future.**

Any irradiation labeling involving the terms "cold pasteurization" or "electronic pasteurization" is very misleading and should not be used. Pasteurization is an entirely different process of rapid heating and cooling than is irradiation.

Regarding the issue of labeling, in its initial petition, the FDA concluded that irradiation was a "material fact" about the processing of a food, and thus should be disclosed. The material fact remains; therefore, labeling should remain. The absence of a label would be misleading, because irradiated foods have different texture, spoilage characteristics, and nutrient losses than non-irradiated foods that would not be obvious or expected by the consumer. Consumers certainly have a right to know if this process has been used on their food.

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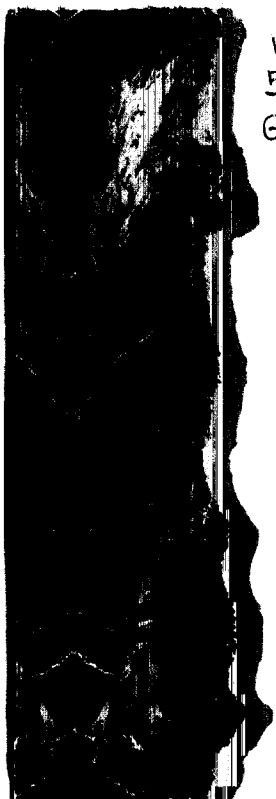
Processing by irradiation causes potentially hazardous chemical changes, higher carcinogenic levels, and radiolytic products that have never been tested. Whether or not the FDA has approved irradiation as safe, it remains a new technology with no long-term studies of public health effects. The FDA's labeling requirement should not be permitted to expire.

Please post comments received on the Internet so that the public may be informed about the comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Walter Scott Ogden", with a long, sweeping horizontal stroke extending to the right.

Walter Scott Ogden



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